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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

19 SECURITIES AND EXCHANGE
COMMISSION,
20 Plaintiff,
21 vs.
22 MATTHEW WADE BEASLEY, *et al.*,
23 Defendants,
24 THE JUDD IRREVOCABLE TRUST, *et al.*,
25 Relief Defendants.

Case No. 2:22-cv-00612-CDS-EJY

Judge Hon. Cristina D. Silva

**NINTH QUARTERLY APPLICATION FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES OF
RECEIVER'S COUNSEL: (1) ALLEN
MATKINS LECK GAMBLE MALLORY &
NATSIS, LLP; AND (2) SEMENZA
KIRCHER RICKARD**

[Declaration of Joshua A. del Castillo; and
Declaration of Jarrod L. Rickard submitted
concurrently herewith]

1111

1 **TO THIS HONORABLE COURT AND ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE THAT** Allen Matkins Leck Gamble Mallory & Natsis LLP
 3 ("Allen Matkins"), general receivership counsel for Geoff Winkler (the "Receiver"), the Court-
 4 appointed receiver in the above-entitled action, and Semenza Kircher Rickard ("SKR"), the
 5 Receiver's local counsel, hereby submit this Ninth Quarterly Application for Payment of Fees and
 6 Reimbursement of Expenses (this "Application").

7 **PLEASE FURTHER TAKE NOTICE** that, in accordance with their customary practice
 8 and this Court's orders, Allen Matkins and SKR submitted their invoices for the period in issue
 9 here to the plaintiff Securities and Exchange Commission (the "SEC") prior to the filing of this
 10 Application. SEC staff has reviewed the invoices and provided comments to Allen Matkins and
 11 SKR as appropriate, and has further expressed that the SEC does not oppose the interim approval
 12 and payment of fees as requested herein.

13 **I. INTRODUCTION.**

14 Allen Matkins and SKR serve as Court-approved counsel to the Receiver, who was
 15 appointed pursuant to this Court's June 5, 2022 *Order Appointing Receiver* (the "Appointment
 16 Order") [ECF No. 88], and whose appointment was reaffirmed via the Court's July 28, 2022 *Order*
 17 *Amending Receivership Order (Dkt. No. 88)* (the "Amended Appointment Order") [ECF No. 207].
 18 Pursuant to the terms of the Appointment Order and Amended Appointment Order, the Receiver is
 19 vested with authority and control over J&J Consulting Services, Inc., an Alaska corporation; J&J
 20 Consulting Services, Inc., a Nevada corporation; J and J Purchasing LLC; The Judd Irrevocable
 21 Trust; and BJ Holdings LLC, and over the Wells Fargo Interest on Lawyers' Trust Account ending
 22 in 5598 and held in the name of Beasley Law Group PC, along with the personal assets of certain
 23 individual defendants in the above-entitled action (all, collectively, the "Receivership
 24 Defendants") and authorized, subject to the approval of this Court, to "engage and employ persons
 25 in his discretion ... to assist him in carrying out his duties and responsibilities [as Receiver],
 26 including, but not limited to ... attorneys" and other professionals. (See Appointment Order at
 27 ¶ 7(F).)

28

1 This Application represents the ninth quarterly application for payment of fees and
 2 reimbursement of expenses submitted by Allen Matkins and SKR in accordance with
 3 Paragraph 62 of the Appointment Order, and covers the fees and expenses incurred by each of
 4 them between April 1, 2024 and June 30, 2024 (the "Application Period").

5 By way of this Application, Allen Matkins and SKR request the Court's approval of 100%
 6 of their fees and expenses incurred during the Application Period, and further request the interim
 7 payment of 80% of such fees and 100% of such expenses, to be paid from the funds of the
 8 receivership estate established in the above-entitled action (the "Receivership Estate" or "Estate").
 9 Specifically, the amounts of the Applicants' fees and expenses sought to be approved and paid
 10 under this Fee Application are as follows:

<u>Applicant</u>	<u>Total Fees</u>	<u>Interim Payment Requested (Fees)</u>	<u>Expenses</u>	<u>Interim Payment Requested (Expenses)</u>
Allen Matkins	\$109,861.33	\$87,889.06	\$3,480.88	\$3,480.88
SKR	\$765.50	\$612.40	\$0.00	\$0.00
<u>TOTAL:</u>	<u>\$110,626.83</u>	<u>\$88,501.46</u>	<u>\$3,480.88</u>	<u>\$3,480.88</u>

16 In accordance with the commitment made to the Receiver by Allen Matkins and SKR in
 17 connection with their engagement in this matter, the fees identified above were billed at rates
 18 significantly discounted from Allen Matkins' and SKR's standard hourly rates, reflecting discounts
 19 in excess of 40% for certain timekeepers or submatters. Consistent with the SEC's billing
 20 guidelines, and Allen Matkins' and SKR's commitment in this federal receivership, Allen Matkins
 21 and SKR hereby request interim payment of only 80% of their respective fees, as noted above; the
 22 remaining, unpaid 20% "holdback" of Allen Matkins' and SKR's approved fees will be subject to
 23 final approval and payment at the conclusion of the instant receivership. **In addition, as an**
 24 **accommodation to the Receivership Estate and in order to maintain a blended billing rate**
 25 **consistent with the goals of the present receivership, Allen Matkins has applied an across-**

1 **the-board discount of an additional 5% to all attorneys' fees incurred during the Application
2 Period.¹**

3 **II. GENERAL SUMMARY.**

4 During the Application Period, and with assistance from Allen Matkins and SKR, the
5 Receiver made substantial progress on critical elements of Estate administration, critically
6 including document recovery, review, and analysis, significant asset recovery and monetization,
7 and case administration – including in connection with a pending Ninth Circuit appellate matter
8 implicating the interests of the Receiver and the Estate – to say nothing of satisfying the Receiver's
9 ongoing filing obligations arising in connection with pending litigation, and regularly reporting on
10 his progress to this Court.

11 As reflected in prior applications for payment of fees and reimbursement of expenses in
12 this matter, the Receiver and his professionals have expended significant time and effort to
13 preserve the *status quo*, pursue the recovery of receivership assets, and undertake efforts to obtain
14 financial documents and other information critical to the Receiver's administration of the Estate
15 and forensic accounting, his evaluation of prospective creditor claims, and any clawback or
16 disgorgement litigation that the Receiver ultimately determines, in his reasonable business
17 judgment, is required to recover assets for the benefit of the Estate and its creditors. While a full
18 accounting of the Receiver's efforts and success is impracticable here, as reflected in the
19 Receiver's interim reporting, his asset recovery efforts have been remarkably successful. Indeed,
20 as of the date of this Application, the Receiver's efforts have resulted in the recovery of assets –
21 including cash, financial instruments, vehicles, a private aircraft, cryptocurrency, real property,
22 and other assets – which he has estimated to have aggregate value of at least \$80 million.

23 As detailed further below, in coordination with Allen Matkins and SKR, the Receiver has
24 continued to attend to critical case administration deadlines and other matters of importance to the
25 receivership, as well as his ongoing efforts to obtain and review essential documents relating to
26

27
28 ¹ Allen Matkins' aggregate fees without the application of the 5% discount totaled \$115,643.50,
during the Application Period.

1 the business and financial activities of the Receivership Defendants, and to recover assets subject
 2 to turnover for the benefit of the Estate and its creditors.

3 Given the amount and significance of the work completed by Allen Matkins and SKR, and
 4 the significant benefit of their efforts to the Estate, Allen Matkins and SKR respectfully submit –
 5 as further detailed in the accompanying motion to approve the Application (filed under separate
 6 cover in omnibus form) that the fees and expenses incurred during the Application Period are
 7 reasonable and appropriate, and should be approved and paid, on an interim basis, in the amounts
 8 indicated above. As an accommodation to the Estate, and consistent with the SEC's billing
 9 guidelines and the ordinary practice in federal receiverships, Allen Matkins and SKR request that
 10 the Court approve 100% of the fees and expenses incurred during the Application Period but
 11 authorize payment, on an interim basis, of only 80% of such fees and 100% of such expenses, at
 12 this time.

13 **III. ALLEN MATKINS' FEES AND EXPENSES.**

14 **A. The Receiver's Retention Of Allen Matkins.**

15 Allen Matkins was retained by the Receiver in June 2022. The Receiver selected Allen
 16 Matkins as one of two firms serving as general receivership counsel due to the firm's decades of
 17 experience and expertise in federal equity receivership matters, as well as in creditors' rights,
 18 litigation, and personal and real property disposition matters. Allen Matkins has served as counsel
 19 to federal equity receivers in dozens of cases, has represented a variety of constituents in hundreds
 20 of bankruptcy matters, and has significant substantive experience in related areas, such as
 21 securities, corporate, and real estate.

22 **B. The Receiver's Retention Of SKR.**

23 SKR was initially retained by the Receiver in June 2022. The Receiver selected SKR as
 24 his local Nevada counsel due to SKR's extraordinary reputation in the Las Vegas legal community,
 25 its prior working relationship with the Receiver's other general receivership counsel, Greenberg
 26 Traurig, LLP, and its familiarity with local policies and procedures applicable to the
 27 administration of the Estate.

28

1 **C. Services Rendered By Allen Matkins During The Application Period.**

2 During the Application Period, Allen Matkins extensively assisted the Receiver in the
 3 performance of his duties under the Appointment Order, primarily by attending to matters critical
 4 to Receivership Estate administration, asset recovery and disposition, and investigation and
 5 reporting.

6 In all, on account of its services rendered to the Receiver during the Application Period,
 7 Allen Matkins billed 220.3 hours and \$109,861.33 in fees, and incurred \$3,480.88 in expenses,
 8 across the following categories²:

<u>Category</u>	<u>Hours</u>	<u>Fees</u>	<u>Expenses</u>
General Receivership	32.5	\$17,652.50	\$3,480.88
Asset Recovery & Management	68.3	\$37,123.50	\$0.00
Investigation & Reporting	110.8	\$56,126.00	\$0.00
Sale, Disposition & Transfer of Assets	7.0	\$3,815.00	\$0.00
Pending Litigation	0.7	\$381.50	\$0.00
Claims & Distribution	1.0	\$545.00	\$0.00
<u>TOTAL:</u>	<u>220.3</u>	<u>\$115,643.50</u>	<u>\$3,480.88</u>
<u>FEE DISCOUNT APPLIED:</u>		<u>(\$5,782.17)</u>	
<u>TOTAL AFTER DISCOUNT</u>		<u>\$109,861.33</u>	

20 Provided below are narrative summaries of the work performed under each of the
 21 categories, and attached hereto as **Exhibit 1** are Allen Matkins' *pro forma* billing statements,
 22 which contain billing entries detailing the tasks performed by the firm's attorneys and paralegals
 23 during the Application Period.

24

25 ² As in prior applications, a limited number of Allen Matkins' entries reflect discussions
 26 between counsel. These entries include language referencing "advice to counsel", "confer with
 27 counsel", or similar discussions in connection with a particular issue. In accordance with
 28 applicable billing guidelines, such discussions have been kept to a minimum. Where they
 occur, Allen Matkins respectfully submits they are necessary and appropriate; on occasion,
 Allen Matkins attorneys will seek out the expertise of other personnel in the firm to avoid
 costly research or otherwise to expedite required work, in order to minimize the expense to the
 receivership.

1 As it has since the inception of this matter, Allen Matkins endeavored to staff each task
 2 efficiently, using a core team of attorneys, with specialized assistance as necessary. As noted
 3 above, Allen Matkins agreed to a significant discount from its ordinary billing rates for this matter,
 4 as well as not to charge the Estate for any travel time associated with services provided to the
 5 Receiver. The fees identified below were billed at rates reflecting discounts of as much as 40%,
 6 resulting in substantial savings for the Estate.³ In addition, and as noted above and further detailed
 7 in the Declarations submitted in support of this Application, Allen Matkins' fee and expense
 8 records were transmitted to the SEC for review on a monthly basis, and have drawn no objection.

9 As the Court may recall, and as noted above, Allen Matkins has agreed to apply a line-item
 10 discount of 5% for the fees incurred during the Application Period, as an accommodation to the
 11 Receivership Estate.

12 **1. General Receivership.**

13 During the Application period, Allen Matkins attorneys billed 32.5 hours to the "General
 14 Receivership" work category, largely in connection with matters relating to the Receiver's
 15 administration of the Estate or attending to administrative matters arising from the Receiver's
 16 obligations under the Appointment Order. Allen Matkins incurred \$3,480.88 in general expenses,
 17 consisting almost entirely of: (1) monthly fees for electronic document hosting and management
 18 services; and (2) costs associated with the service of subpoenas upon financial institutions and
 19 other parties in connection with the Receiver's ongoing investigation and forensic accounting.
 20 Allen Matkins personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	0.4	\$218.00
Joshua del Castillo	Partner	\$545	31.5	\$17,167.50
Matthew Pham	Associate	\$445	0.6	\$267.00
<u>TOTAL:</u>			<u>32.5</u>	<u>\$17,652.50</u>

27
 28 ³ Indeed, had Allen Matkins billed at its standard rates, its fees for the Application Period would
 be tens of thousands of dollars more than the amount requested in the Application.

1 Work performed in this category generally related to critical case and Estate administration
 2 matters. During the Application Period, Allen Matkins personnel: (1) attended to outstanding
 3 case administration tasks; (2) with the Receiver and co-counsel, continued the development of the
 4 Receiver's plans for the administration of the Estate and its assets; (3) analyzed briefing in
 5 connection with a pending Ninth Circuit appellate matter and provided recommendations to the
 6 Receiver; (4) monitored relevant dockets and conducted analysis of discovery-related issues in
 7 connection with pending litigation; and (5) prepared for and attended meetings of counsel and
 8 Court hearings. These efforts have contributed to a streamlines case and Estate administration
 9 strategy, assisted in the Receiver in developing appropriate assessments of numerous pleadings
 10 that directly implicated the receivership, and facilitated the Receiver's pursuit of his obligations to
 11 the Court and interested parties.

12 **2. Asset Recovery & Management.**

13 During the Application period, Allen Matkins attorneys billed 68.3 hours to the "Asset
 14 Recovery & Management" work category. Allen Matkins personnel billed the following time and
 15 fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	1.9	\$1,035.50
Joshua del Castillo	Partner	\$545	65.4	\$35,643.00
James Robichaud	Associate	\$445	1.0	\$445.00
<u>TOTAL:</u>			<u>68.3</u>	<u>\$37,123.50</u>

21 The time expended in this category related to the Receiver's continued efforts to recover
 22 from third parties assets subject to the turnover provisions of the Appointment Order and
 23 Amended Appointment Order, which require all third parties in possession of assets of the
 24 Receivership Defendants to turn such assets over to the Receiver. During the Application Period,
 25 Allen Matkins attorneys: (1) conferred with the Receiver's office regarding the status of a variety
 26 of turnover-related matters; (2) reviewed materials relating to pending turnover demands,
 27 (3) conferred with the Receiver regarding the disposition of turned-over real properties; and
 28

1 (4) prepared new and follow-up turnover demands to third parties, including at least one institution
 2 in possession of cryptocurrency assets. As a result of these efforts, during the Application Period,
 3 the Receiver recovered more than \$300,000 in additional funds, and identified two additional
 4 Estate assets with a potential aggregate value of over \$1.5 million, the turnover of which assets
 5 Allen Matkins is presently pursuing.

6 As noted above, these efforts have contributed to the Receiver's recovery of at least
 7 \$80 million in cash, vehicles, a private aircraft, cryptocurrency, real property, and other assets for
 8 the benefit of the Estate and its creditors.

9 **3. Investigation and Reporting.**

10 During the Application period, Allen Matkins attorneys billed 110.8 hours to the
 11 "Investigation & Reporting" work category.

12 Allen Matkins personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
David Zaro	Partner	\$545	3.8	\$2,071.00
Joshua del Castillo	Partner	\$545	64.4	\$35,098.00
Matthew Pham	Associate	\$445	40.1	\$17,844.50
James Robichaud	Associate	\$445	2.5	\$1,112.50
<u>TOTAL:</u>			<u>110.8</u>	<u>\$56,126.00</u>

20 During the Application Period, the Receiver, with assistance from Allen Matkins, devoted
 21 significant attention to ongoing document recovery and review efforts in connection with his
 22 forensic accounting and litigation goals.

23 At the Receiver's request, Allen Matkins engaged in extensive and ongoing efforts to
 24 recover documents relevant to the Receiver's ongoing accounting and litigation efforts, as well as
 25 to prepare follow-up requests for additional document production from various third parties,
 26 including multiple financial institutions, as deficiencies in existing productions were identified by
 27 the Receiver's accounting team. Additionally, resistance to the Receiver's counsel's discovery

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1 efforts created a discovery dispute in the Wells Fargo Case, which has required the Receiver's
 2 counsel to confer with the Receiver's special litigation counsel to address related matters.

3 During the Application Period, and among other things, Allen Matkins attorneys:
 4 (1) obtained and performed an initial review of tens of thousands of pages of additional discovery
 5 material; (2) corresponded extensively with counsel for certain financial institutions concerning
 6 their respective status of production and response to subpoenas; (3) prepared and transmitted
 7 subpoena follow-up letters to multiple financial institutions regarding outstanding items;
 8 (4) continued correspondence with counsel for a financial institution regarding documents omitted
 9 from an initial document production and Allen Matkins' outstanding requests for supplemental
 10 production; (5) corresponded extensively with the Receiver's accounting team with respect to the
 11 above-described document production efforts; (6) reviewed documents in connection with the
 12 preparation of the Receiver's next interim report; (7) conducted legal analysis and contemplated
 13 potential privilege or privacy issues regarding outstanding subpoenas and other discovery efforts;
 14 (8) conferred with the Receiver to prepare his declaration regarding progress made as to the
 15 subpoenas; (9) assisted with the satisfaction of the Receiver's reporting obligations to the Court;
 16 and attended to the preparation of draft pleadings relating to the Receiver's ongoing forensic
 17 accounting efforts.

18 **4. Sale, Disposition & Transfer of Assets.**

19 During the Application period, Allen Matkins attorneys billed 7.0 hours to the " Sale,
 20 Disposition & Transfer of Assets " work category.

21 Allen Matkins personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
Joshua del Castillo	Partner	\$545	7.0	\$3,815.00
<u>TOTAL:</u>			7.0	\$3,815.00

25 During the Application Period, Allen Matkins attorneys assessed the status of the
 26 Receiver's turnover efforts, conducted legal analysis of potential title issues and other outstanding
 27

1 items relating to real properties turned over to the Receiver, attended to sale-related inquiries
 2 regarding real property, and analyzed valuation issues relating to the Estate's intangible assets.

3 **5. Pending Litigation.**

4 During the Application period, Allen Matkins attorneys billed 0.7 hours to the "Pending
 5 Litigation" work category.

6 Allen Matkins personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
Joshua del Castillo	Partner	\$545	0.7	\$381.50
<u>TOTAL:</u>			0.7	\$381.50

7 Work performed in this category related to the analysis of an issue arising in litigation
 8 attendant to the above-entitled receivership action, and its prospective impact upon the
 9 receivership.

10 **6. Claims & Distribution.**

11 During the Application period, Allen Matkins attorneys billed 1 hour to the " Claims &
 12 Distribution " work category.

13 Allen Matkins personnel billed the following time and fees during the Application Period:

<u>Timekeeper</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Hours</u>	<u>Fees</u>
Joshua del Castillo	Partner	\$545	1.0	\$545.00
<u>TOTAL:</u>			1.0	\$545.00

14 Work performed in this category related to the analysis of an issue raised by a purported
 15 pre-receivership attorney.

16 **IV. SERVICES RENDERED BY SKR DURING THE APPLICATION PERIOD.**

17 During the Application Period, SKR provided critical local counsel support to the
 18 Receiver, largely in connection with outstanding case administration deadlines, filings, and court
 19 proceedings. Among other things, SKR ensured outstanding filing deadlines were satisfied,
 20 provided logistical support on matters arising in connection with the above-entitled matter and the
 21

1 Wells Fargo Case, reviewed and assisted with the submission of the Receiver's filings in this
 2 matter, and attended a status conference proceeding on behalf of the Receiver.

3 A complete description of the services rendered by SKR can be found in the invoices
 4 collectively appended hereto as **Exhibit 2**.

5 By way of summary, SKR attorneys and staff billed the following amounts each month
 6 during the Application Period:

<u>Month</u>	<u>Total Fees Billed</u>
April 2024	\$104.00
May 2024	\$29.00
June 2024	\$632.50
<u>TOTAL:</u>	\$765.50

12

13 **V. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE**
 14 **ALLOWED.**

15 Allen Matkins and SKR respectfully submit that the fees and expenses incurred during the
 16 Application Period were fair, reasonable, and necessary, and that the associated services provided
 17 were of significant benefit to the Estate. Specifically, and as reflected in **Exhibits 1 and 2**, Allen
 18 Matkins and SKR have endeavored to staff this matter appropriately and have billed their time at
 19 substantially discounted rates. Additionally, Allen Matkins and SKR have steadfastly attempted
 20 to avoid duplication of effort by, among other things, coordinating with the Receiver and co-
 21 counsel to allocate tasks and responsibilities and participating in regular discussions regarding
 22 work in progress to minimize the likelihood of duplication.

23 As reflected in the Receiver's prior submissions to this Court, Allen Matkins and SKR are
 24 providing an extremely high quality of work in a matter involving dozens of relevant parties and
 25 hundreds of millions of dollars in assets. Their efforts are bearing fruit: the Receiver has
 26 recovered at least \$80 million in personal and real property assets. He has consistently succeeded
 27 in securing necessary and appropriate relief from the Court, the turnover of cash and other assets,
 28 and the sales of personal and real property. Put simply, in a highly complex receivership, and

1 while the Receiver continues to develop a comprehensive knowledge and understanding the
 2 underlying facts, critical players, and assets, the Receiver – with the help of Allen Matkins and
 3 SKR – is recovering millions of dollars in cash, obtaining the turnover of millions of dollars in
 4 personal and real property, and has already secured Court approval of and successfully undertaken
 5 procedures aimed at monetizing those assets in a manner intended to maximize the recovery for
 6 the benefit of the Estate and creditors, including investors. The fees and expenses incurred by
 7 Allen Matkins and SKR during the Application Period are minimal when compared to these
 8 results⁴, and Allen Matkins and SKR respectfully request that the Court approve 100% of their
 9 fees and expenses, and also authorize the payment of those fees and expenses on a percentage,
 10 interim basis, as requested herein.

11 Allen Matkins' and SKR's invoices were submitted to the SEC for review prior to the filing
 12 of this Application, and as of the date of the filing of this Application, the SEC has not indicated
 13 that it has substantive questions regarding, or will oppose, the Application.

14 **VI. CONCLUSION.**

15 For the foregoing reasons, Allen Matkins and SKR respectfully requests that the Court
 16 enter an order:

- 17 1. Granting this Application in its entirety;
- 18 2. Approving Allen Matkins' discounted fees and expenses incurred during the
 Application Period, in the respective amounts of \$109,861.33 and \$3,480.88;
- 19 3. Authorizing the Receiver to pay Allen Matkins, on an interim basis, 80% of its
 approved fees incurred during the Application Period, in the amount of \$87,889.06, and 100% of
 its approved expenses incurred during the Application Period, in the amount of \$3,480.88, from
 the funds of the Receivership Estate;
- 20 4. Approving SKR's fees incurred during the Application Period, in the amount of
 \$765.50; and

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23

24 ⁴ Indeed, the less than \$90,000.00 requested in this application reflects approximately one tenth
 of one percent of the at least \$80 million in assets already recovered by the Receiver.

5. Authorizing the Receiver to pay SKR, on an interim basis, 80% of its approved fees incurred during the Application Period, in the amount \$612.40; and

6. Providing such other and further relief as the Court deems just and proper.

Dated: August 12, 2024

SEMENTZA KIRCHER RICKARD

/s/ *Jarrod L. Rickard*

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Los Angeles, California 90017-2543

Attorneys for Receiver Geoff Winkler

CERTIFICATE OF SERVICE

I am employed by the law firm of Semenza Kircher Rickard in Clark County. I am over the age of 18 and not a party to this action. The business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

On the 12th day of August, 2024, I served the document(s), described as:

**NINTH QUARTERLY APPLICATION FOR PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL: (1) ALLEN
MATKINS LECK GAMBLE MALLORY & NATSIS, LLP; AND (2) SEMENZA
KIRCHER RICKARD**

[Declaration of Joshua A. del Castillo; and Declaration of Jarrod L. Rickard submitted concurrently herewith]

by serving the original a true copy of the above and foregoing via:

☒ a. CM/ECF System to the following registered e-mail addresses:

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13 George W. Cochran, III lawchrist@gmail.com
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15 Michael E. Welsh welshmi@sec.gov
16 John Giardino jgiardino@pryorcashman.com
17 David Baddley baddleyd@sec.gov
18 Kamille Dean Kamille@kamilledean.com

20 b. **BY U.S. MAIL.** I deposited such envelope in the mail at Las Vegas, Nevada. The
21 envelope(s) were mailed with postage thereon fully prepaid. I am readily familiar with Semenza
22 Kircher Rickard's practice of collection and processing correspondence for mailing. Under that
23 practice, documents are deposited with the U.S. Postal Service on the same day, which is stated in
24 the proof of service, with postage fully prepaid at Las Vegas, Nevada in the ordinary course of
business. I am aware that on motion of party served, service is presumed invalid if the postal
cancellation date or postage meter date is more than one day after the date stated in this proof of
service.

25 c. **BY PERSONAL SERVICE.**

26 d. **BY DIRECT EMAIL.**

27 ///
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1 e. **BY FACSIMILE TRANSMISSION.**

2 I declare under penalty of perjury that the foregoing is true and correct.

3
4 */s/ Olivia A. Kelly*

5 An Employee of Semenza Kircher Rickard

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EXHIBIT 1

EXHIBIT 1

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00002

Client Name: Winkler, Geoff - Receiver for J&J Consul

Date of Last Billing: 06/01/24

Matter Name: General Receivership

Proforma Number: 1287426

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	HD	Circle	Action	
04/02/24	9572856	Review docket and recent Grigsby associated filings (0.2).	Del Castillo, Joshua	0.20	109.00	109.00	WO	HD	TR		
04/04/24	9574930	Prepare for and attend videoconference with Receiver and GT co-counsel (0.5).	Del Castillo, Joshua	0.50	272.50	381.50	WO	HD	TR		
04/09/24	9580143	Attention to case administration matters and confer with M. Kebbeh regarding matters requiring attention (0.9).	Del Castillo, Joshua	0.90	490.50	872.00	WO	HD	TR		
04/11/24	9582270	Review materials, confer with M. Pham, and attend videoconference with Receiver's office and co-counsel regarding case administration matters (0.6); review docket and case and hearing deadlines (0.2).	Del Castillo, Joshua	0.80	436.00	1,308.00	WO	HD	TR		
04/18/24	9590293	Attention to and emails with Receiver's office regarding case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	1,580.50	WO	HD	TR		
04/23/24	9596388	Review docket and attention to case administration matters (0.5); follow-up emails to counsel and Receiver's office regarding same (0.4); review materials transmitted by Receiver's office in	Del Castillo, Joshua	1.40	763.00	2,343.50	WO	HD	TR		

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		connection with anticipated motion and emails regarding same (0.5).						
04/24/24	9597509	Emails with SEC, Receiver, and GT co-counsel regarding status of Receiver declaration (0.5); follow-up emails regarding case administration and hearings (0.3).	Del Castillo, Joshua	0.80	436.00	2,779.50	WO	HD
04/26/24	9599219	Review correspondence and draft filings from SEC (0.4); emails with Receiver's office and co-counsel (0.2).	Del Castillo, Joshua	0.60	327.00	3,106.50	WO	HD
04/27/24	9601285	Emails regarding recent filings and case administration matters with counsel (0.6).	Del Castillo, Joshua	0.60	327.00	3,433.50	WO	HD
04/29/24	9601613	Emails with D. Zaro and M. Pham and attention to case administration matters (0.4).	Del Castillo, Joshua	0.40	218.00	3,651.50	WO	HD
05/02/24	9609829	Review materials provided by Receiver's office in advance of, and prepare and attend videoconference with Receiver's office and GT co-counsel regarding case administration matters (1.0); teleconference with D. Zaro regarding same (0.3); review pleadings and prepare mark-up of same (0.5).	Del Castillo, Joshua	1.80	981.00	4,632.50	WO	HD
05/03/24	9610087	Review Receiver opposition to motion for stay and confer regarding same (0.7); review documents, prepare for, and attend videoconference with Receiver and GT co-counsel regarding case administration discussions with SEC (1.0); confer with M. Pham regarding outstanding case administration issues (0.5); prepare for and	Del Castillo, Joshua	2.70	1,471.50	6,104.00	WO	HD

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		videoconference with SEC (0.5).						
05/07/24	9614456	Emails with GT co-counsel regarding case administration matters (0.2).	Del Castillo, Joshua	0.20	109.00	6,213.00	WO	HD
05/09/24	9616712	Review documents in preparation for videoconference with Receiver's office and GT co-counsel (0.5); attend videoconference (0.4).	Del Castillo, Joshua	0.90	490.50	6,703.50	WO	HD
05/10/24	9617819	Review and confer regarding draft Receiver pleadings (0.5).	Del Castillo, Joshua	0.50	272.50	6,976.00	WO	HD
05/13/24	9620608	Attention to case administration matters and outstanding matters, and emails to AM counsel regarding same (0.7); emails to Receiver's office and co-counsel regarding same (0.4).	Del Castillo, Joshua	1.10	599.50	7,575.50	WO	HD
05/16/24	9624535	Prepare for and attend videoconference with Receiver and GT co-counsel (0.5); confer with M. Pham regarding upcoming hearing and other case administration matters and follow-up emails regarding same (0.5).	Del Castillo, Joshua	1.00	545.00	8,120.50	WO	HD
05/17/24	9625363	Review Grigsby motion to extend briefing deadline and follow-up emails regarding status of Grigsby dispute (0.2).	Del Castillo, Joshua	0.20	109.00	8,229.50	WO	HD
05/23/24	9633164	Review materials and emails and prepare update to Receiver's office regarding status of outstanding matters (0.8); review Grigsby appellate order and emails regarding same (0.2); review documents from Receiver's office and prepare for and attend	Del Castillo, Joshua	1.80	981.00	9,210.50	WO	HD

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		videconference with Receiver and GT co-counsel (0.6); review and respond to SEC inquiry (0.2).								
05/30/24	9640242	Emails with Receiver's office and AM counsel regarding case administration matters (0.5); review docket and prepare inquiries to Receiver and GT co-counsel (0.5); prepare for and attend videoconference with Receiver and GT co-counsel (0.6).	Del Castillo, Joshua	1.60	872.00	10,082.50	WO	HD	TR	
05/31/24	9643223	Attention to case administration matters (0.5).	Del Castillo, Joshua	0.50	272.50	10,355.00	WO	HD	TR	
06/05/24	9649540	Attention to matters relating to upcoming case administration and hearing deadlines and review notes and correspondence from Receiver's office and GT co-counsel regarding same (0.7).	Del Castillo, Joshua	0.70	381.50	10,736.50	WO	HD	TR	
06/06/24	9650112	Review docket and respond to inquiries regarding case administration matters (0.3); emails to Receiver's office and GT co-counsel (0.2); emails to M. Pham (0.2); review documents and prepare for and attend videoconference with Receiver's office and GT co-counsel (0.4).	Del Castillo, Joshua	1.10	599.50	11,336.00	WO	HD	TR	
06/07/24	9653667	Confer with Josh del Castillo regarding status update on outstanding tasks	Pham, Matt D.	0.40	178.00	11,514.00	WO	HD	TR	
06/08/24	9671686	Review receivership filings and prepare notes for discussion with Receiver and GT co-counsel regarding case and receiver administration issues with respect to	Del Castillo, Joshua	1.60	872.00	12,386.00	WO	HD	TR	

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		outstanding asset recovery, discovery, and claims matters (1.1); emails to AM counsel regarding same (0.5).								
06/10/24	9653572	Emails with local counsel and District Court regarding upcoming hearing (0.2); attention to related case administration matters (0.5); confer with M. Pham regarding same (0.2).	Del Castillo, Joshua	0.90	490.50	12,876.50	WO	HD	TR	
06/11/24	9662235	Review and respond to emails to/from Receiver's office, GT co-counsel, SEC and District Court regarding pending case administration and scheduling issues (0.5); teleconferences regarding same (0.7).	Del Castillo, Joshua	1.20	654.00	13,530.50	WO	HD	TR	
06/12/24	9658899	Review documents and prepare for and virtually attend status conference (1.0); review Court order and respond to inquiry from Receiver regarding same (0.2).	Del Castillo, Joshua	1.20	654.00	14,184.50	WO	HD	TR	
06/13/24	9658793	Emails and teleconferences with AM counsel and GT co-counsel regarding case administration issues and outstanding requests from Receiver's office (0.6); prepare for and attend videoconference with Receiver and GT co-counsel (0.5); review file and transmit requested materials to Receiver's office (0.4).	Del Castillo, Joshua	1.50	817.50	15,002.00	WO	HD	TR	
06/13/24	9663746	Confer with Josh del Castillo regarding case updates and outstanding tasks	Pham, Matt D.	0.20	89.00	15,091.00	WO	HD	TR	
06/20/24	9668265	Conferences related to the discovery issues and approach to discovery as to WFB and contingent fee counsel/advice to	Zaro, David	0.40	218.00	15,309.00	WO	HD	TR	

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered counsel/Receiver.	Timekeeper	Hours	Fees	Sum	Circle	Action	WO	HD	TR	
06/24/24	9671052	Review Grigsby Ninth Circuit opening brief and emails with Receiver and GT co-counsel regarding same (1.8); legal analysis in connection with same and prepare notes for discussion (1.0).	Del Castillo, Joshua	2.80	1,526.00	16,835.00	WO	HD	TR			
06/26/24	9673849	Attention to case administration matters (0.2).	Del Castillo, Joshua	0.20	109.00	16,944.00	WO	HD	TR			
06/27/24	9675647	Prepare for and videoconference with Receiver's office and GT co-counsel regarding case administration issues (0.3); attention to case administration matters (0.3); prepare notes regarding Grigsby Ninth Circuit briefing (0.5).	Del Castillo, Joshua	1.10	599.50	17,543.50	WO	HD	TR			
06/28/24	9676475	Emails to M. Pham regarding case administration matters (0.2).	Del Castillo, Joshua	0.20	109.00	17,652.50	WO	HD	TR			

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action	WO	HD	TR	
04/01/24	2874795	EDISC – CS Disco, Inc. - Monthly Hosting for April 2024	0.00	257.37	WO	HD	TR			
04/03/24	2872356	BW – Duplication - Black & White Copies	60.00	11.40	WO	HD	TR			
04/03/24	2872414	DCSRCH – Citibank N.A. - Research	0.00	155.72	WO	HD	TR			
04/03/24	2874268	MSNGR – Federal Express - Ship To: Lucy Michael, VP of Legal Ops - Paseo Legal Operations Departm	0.00	18.42	WO	HD	TR			
04/03/24	2874272	MSNGR – Federal Express - Ship To: General Counsel -	0.00	28.15	WO	HD	TR			

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
		Credit Union 1		WO	HD	TR	_____	
04/05/24	2874909	POS – Nationwide Legal, LLC - JPMorgan Chase Bank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	197.25	WO	HD	TR	_____
04/10/24	2873287	DCSRCH – Citibank N.A. - Research	0.00	184.28	WO	HD	TR	_____
05/01/24	2878906	EDISC – CS Disco, Inc. - Monthly Hosting for May 2024	0.00	257.31	WO	HD	TR	_____
05/08/24	2878475	POS – Nationwide Legal, LLC - Frost Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	341.60	WO	HD	TR	_____
05/08/24	2878476	POS – Nationwide Legal, LLC - Metropolitan Commercial Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	341.60	WO	HD	TR	_____
05/08/24	2878477	POS – Nationwide Legal, LLC - Sky Federal Credit Union, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	338.60	WO	HD	TR	_____
05/08/24	2878478	POS – Nationwide Legal, LLC - Hawaiian Financial Federal Credit Union, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	341.60	WO	HD	TR	_____
05/08/24	2878479	POS – Nationwide Legal, LLC - SchoolsFirst Federal Credit Union, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	286.60	WO	HD	TR	_____
05/10/24	2877667	BW – Duplication - Black & White Copies	63.00	11.97	WO	HD	TR	_____
05/21/24	2879683	ODS – Frost Bank - Providing banking records from January 21, 2021 & May 18, 2021	0.00	183.60	WO	HD	TR	_____
05/29/24	2880277	BW – Duplication - Black & White Copies	50.00	9.50	WO	HD	TR	_____
05/29/24	2887041	POST – Postage - RICOH - 2 CRR	0.00	21.28	WO	HD	TR	_____

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
06/01/24	2884265	EDISC – CS Disco, Inc. - Monthly Hosting for June 2024	0.00	257.31	WO	HD	TR	_____
06/04/24	2885094	POS – Nationwide Legal, LLC - Massachusetts Mutual Life Insurance Company, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	198.60	WO	HD	TR	_____
06/18/24	2885633	MSNGR – Federal Express - Ship To: Geoff Winkler, Receiver	0.00	38.72	WO	HD	TR	_____
06/25/24	2891901	POS – Process of Service - Nationwide Legal LLC - SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.60	WO	HD	TR	_____
06/25/24	2891902	POS – Process of Service - Nationwide Legal LLC - SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	173.90	WO	HD	TR	_____
06/25/24	2891903	POS – Process of Service - Nationwide Legal LLC - SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.60	WO	HD	TR	_____
06/25/24	2891904	POS – Process of Service - Nationwide Legal LLC - SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	301.60	WO	HD	TR	_____
06/25/24	2891905	POS – Process of Service - Nationwide Legal LLC - SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	150.90	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.40	545.00	218.00
001842	Del Castillo, Joshua	31.50	545.00	17,167.50
002510	Pham, Matt D.	0.60	445.00	267.00
		32.50		\$17,652.50

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
Subtotal Fees				\$17,652.50
Discount				0.00
Total Fees				17,652.50
Total Disbursements				4,710.48

Attorney Billing Instructions

(<input type="checkbox"/>)	BILL ALL	(<input type="checkbox"/>)	Hold
(<input type="checkbox"/>)	BILL FEES ONLY	(<input type="checkbox"/>)	Write Off
(<input type="checkbox"/>)	BILL COST ONLY	(<input type="checkbox"/>)	Transfer All

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 08/01/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,121.75	2,794.00	327.75	45,403.07	36,037.00	9,366.07	259,173.15	226,463.00	32,710.15
Unbilled Adj	0.00	0.00	0.00	109.00	109.00	0.00	2,754.18	2,360.20	393.98
Billed	0.00	0.00	0.00	43,839.07	31,252.50	12,586.57	203,927.62	203,927.62	27,999.67
Collected	0.00	0.00	0.00	43,839.07	31,252.50	12,586.57	231,927.29	203,927.62	27,999.67
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP									
Balance	25,905.79	20,501.00	5,404.79						
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing

08/12/24 10:52:18 PROFORMA STATEMENT FOR MATTER 392775.00002 (Winkler, Geoff - Receiver for J&J Consul) (General Receivership)

LLC; The Judd Irrevocable Trust; BJ Holdings LLC

Geoff B. Winkler

American Fiduciary Services LLC

715 NW Hoyt Street, Suite 4364

Portland, OR 97208

08/12/24 10:52:20 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua
 Matter #: 392775.00003
 Client Name: Winkler, Geoff - Receiver for J&J Consul
 Date of Last Billing: 06/01/24
 Matter Name: Asset Recovery & Management
 Proforma Number: 1287426
 Client/Matter Joint Group # 392775.1
 Client Matter Number:

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	HD	Circle Action	TR	
04/02/24	9572583	Review Receiver inquiry regarding status of turnover demand and review notes and file regarding same (0.5); confer with J. Robichaud and M. Pham regarding follow-up demands and review draft demand letters in connection with same (0.8); analysis of turnover issues raised by J. Robichaud (1.0); emails to Receiver's office (0.2); revise Credit Union 1 follow-up demand (0.3).	Del Castillo, Joshua	2.80	1,526.00	1,526.00					
04/02/24	9573998	Draft second follow-up demand letter to Credit Union 1 and confer with J. del Castillo regarding same (1.0).	Robichaud, James	1.00	445.00	1,971.00	WO	HD	TR		
04/03/24	9573670	Emails with Receiver's office regarding account turnover issues and review associated documents (0.7); emails with J. Robichaud regarding same (0.3).	Del Castillo, Joshua	1.00	545.00	2,516.00	WO	HD	TR		
04/04/24	9575115	Review emails and documents provided by Credit Union 1 in response to demand letter and confer with J. Robichaud regarding same (0.5); prepare update to Receiver	Del Castillo, Joshua	0.60	327.00	2,843.00	WO	HD	TR		

08/12/24 10:52:20 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered (0.1).	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/08/24	9602685	Emails with Receiver's office regarding turnover demand and follow-up regarding same (0.7); emails and follow-up to bank representatives regarding same (0.5).	Del Castillo, Joshua	1.20	654.00	3,497.00	WO	HD	TR	_____
04/09/24	9579987	Review correspondence and confer with AM counsel regarding outstanding turnover demands (0.6); emails to Credit Union 1 and respond to inquiry regarding same (0.5).	Del Castillo, Joshua	1.10	599.50	4,096.50	WO	HD	TR	_____
04/17/24	9588924	Emails and teleconferences with counsel and bank representatives regarding outstanding turnover demands (1.1); legal analysis of issue raised in connection with turnover provisions of appointment order (2.1).	Del Castillo, Joshua	3.30	1,798.50	5,895.00	WO	HD	TR	_____
04/18/24	9589993	Review correspondence from Receiver to Credit Union 1 regarding turnover and update M. Pham regarding same (0.2).	Del Castillo, Joshua	0.20	109.00	6,004.00	WO	HD	TR	_____
04/25/24	9598556	Review and respond to email from Receiver's office regarding outstanding turnover issues (0.2); review filings, defendant account summaries, and related matters (1.9); emails with M. Pham regarding same (0.4); confer with M. Pham (0.2).	Del Castillo, Joshua	2.70	1,471.50	7,475.50	WO	HD	TR	_____
04/26/24	9599031	Review notes and correspondence regarding turnover efforts and communications to present and prepare follow-up inquiries regarding same (0.8).	Del Castillo, Joshua	0.80	436.00	7,911.50	WO	HD	TR	_____

08/12/24 10:52:20 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	HD	TR	
04/27/24	9601288	Legal analysis of issues arising in connection with prospective turnover demands and prepare summary of same (2.5).	Del Castillo, Joshua	2.50	1,362.50	9,274.00	WO	HD	TR	
04/29/24	9602392	Emails and attention to turnover issues (0.6); review Receiver's prior correspondence regarding demand letters (0.2); review co-counsel correspondence regarding same (0.3).	Del Castillo, Joshua	1.10	599.50	9,873.50	WO	HD	TR	
05/01/24	9608214	Review file regarding turnover demands and emails to AM counsel regarding same (1.5); prepare outline for revised turnover effort (0.5); review BitcoinIRA-related correspondence and filings, and prepare revised demand letter to same (0.6); emails to Receiver's office regarding same (0.2); review and respond to emails from BitcoinIRA counsel and follow-up with Receiver's office regarding same (0.5).	Del Castillo, Joshua	3.30	1,798.50	11,672.00	WO	HD	TR	
05/02/24	9609864	Review and respond to correspondence from Bitcoin IRA and Receiver's office and attention to turnover issues (0.8).	Del Castillo, Joshua	0.80	436.00	12,108.00	WO	HD	TR	
05/02/24	9610503	Review emails/report and then follow-up on the investigation and call with counsel to address status of recovery of assets from third parties including Crypto/Flavocure debentures (.6). Emails related to the Flavocure valuation and advice to counsel re: recovery (.3).	Zaro, David	0.90	490.50	12,598.50	WO	HD	TR	

08/12/24 10:52:20 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
							WO	HD	TR	
05/03/24	9610088	Review and respond to emails from Receiver's office, AM counsel, and demanded parties regarding turnover matters (0.5).	Del Castillo, Joshua	0.50	272.50	12,871.00				
05/03/24	9610755	Confer with D. Zaro regarding Receiver's request for follow-up on turnover matters and review documents regarding new turnover targets (1.9); correspondence with Receiver's office (0.4).	Del Castillo, Joshua	2.30	1,253.50	14,124.50	WO	HD	TR	
05/03/24	9612318	Address additional asset recovery issues and confer with counsel as to approach and coordination of work.	Zaro, David	0.40	218.00	14,342.50	WO	HD	TR	
05/06/24	9613320	Emails and teleconferences with Receiver's office and AM counsel regarding pending and anticipated turnover requests (1.0); attention to issues regarding same (0.5); prepare correspondence to Robinhood regarding turnover (0.5); review and respond to correspondence from D. Zaro regarding Flavocure (0.2).	Del Castillo, Joshua	2.20	1,199.00	15,541.50	WO	HD	TR	
05/06/24	9614286	Investigate the status of the Flavocure entity, call re: financial condition and any updates as to FDA related to the company and prospective recovery.	Zaro, David	0.60	327.00	15,868.50	WO	HD	TR	
05/07/24	9614232	Review additional materials transmitted by Receiver's office regarding prospective additional turnover demands and analysis of issues presented by same (2.0); confer with M. Pham and Receiver's office regarding same (0.7).	Del Castillo, Joshua	2.70	1,471.50	17,340.00	WO	HD	TR	

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	Circle	Action
							HD	TR	
05/08/24	9615375	Review documents produced, emails, notes, and filings associated with US Bank turnovers (1.8); assemble materials requested by Receiver and transmit (1.0); emails and confer with Receiver's office regarding US Bank turnovers (0.8).	Del Castillo, Joshua	3.60	1,962.00	19,302.00	WO	HD	TR
05/09/24	9616720	Review and respond to third party emails and confer with Receiver and counsel regarding pending turnover requests and accountings (0.7).	Del Castillo, Joshua	0.70	381.50	19,683.50	WO	HD	TR
05/10/24	9617408	Follow-up emails to Receiver's office, BitcoinIRA and Robinhood regarding turnover requests and inquiries (0.6); analysis of issue raised by crypto exchange matter (0.6).	Del Castillo, Joshua	1.20	654.00	20,337.50	WO	HD	TR
05/13/24	9620143	Emails with Receiver's office and AM co-counsel regarding asset turnover developments (0.5).	Del Castillo, Joshua	0.50	272.50	20,610.00	WO	HD	TR
05/16/24	9624382	Follow-up emails internally and to Receiver's office regarding outstanding turnover demands and related matters, and review documents and attention to issues regarding same (.7).	Del Castillo, Joshua	0.70	381.50	20,991.50	WO	HD	TR
05/17/24	9625333	Emails with Robinhood representative and Receiver's office regarding turnover demand for identified accounts (0.5).	Del Castillo, Joshua	0.50	272.50	21,264.00	WO	HD	TR
05/18/24	9628099	Review all turnover demands since inception of case and compare against summary of receipts (0.9); prepare outline for discussion with Receiver and AM	Del Castillo, Joshua	1.90	1,035.50	22,299.50	WO	HD	TR

08/12/24 10:52:20 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		counsel (0.7); emails to AM counsel regarding same (0.3).								
05/20/24	9628035	Emails and teleconferences with third parties and AM counsel regarding pending turnover demands and related matters (1.0).	Del Castillo, Joshua	1.00	545.00	22,844.50	WO	HD	TR	_____
05/21/24	9630197	Emails with J. McGraw regarding additional turnover demands and review prior correspondence regarding Robinhood accounts (0.5); review Wells Fargo certified statement and follow-up inquiries with Receiver's office and AM counsel regarding same (0.4); review and respond to correspondence from J. McGraw regarding Prudential and Mass Mutual policies and prospective turnover demands in connection with same (0.3); review documents transmitted by J. McGraw regarding Prudential and Mass Mutual (0.7); analysis of turnover issue arising in connection with same (0.9)	Del Castillo, Joshua	2.80	1,526.00	24,370.50	WO	HD	TR	_____
05/22/24	9631169	Review documents and analysis regarding additional turnover matters (1.9); prepare outline for demands to insurers and confer with AM counsel regarding same (1.0); emails to Robinhood counsel (0.2).	Del Castillo, Joshua	3.10	1,689.50	26,060.00	WO	HD	TR	_____
05/23/24	9632311	Review of additional documents regarding pending turnover requests and correspondence with Receiver's office regarding same (0.9).	Del Castillo, Joshua	0.90	490.50	26,550.50	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	Circle	Action
							HD	TR	
05/24/24	9634060	Review documents in connection with Receiver turnover requests (1.0); emails and teleconferences with AM counsel regarding same (0.5); review file and docket (0.6); revise draft subpoenas and letters to Prudential and Mass Mutual (0.7); emails with Robinhood counsel and Receiver's office regarding original and additional turnover requests (0.7).	Del Castillo, Joshua	3.50	1,907.50	28,458.00	WO	HD	TR
05/25/24	9635563	Review additional documents provided by Receiver's office in connection with pending and contemplated turnover demands (1.7); prepare draft subpoena language in connection with same (0.5).	Del Castillo, Joshua	2.20	1,199.00	29,657.00	WO	HD	TR
05/28/24	9636873	Emails with Receiver's office regarding pending turnover requests (0.2); confer with M. Pham regarding same (0.2); revise and prepare additional documents in connection with anticipated turnover-related subpoenas (0.8); review insurance policy materials transmitted by J. McGraw and correspondence regarding same (1.0); prepare revised and additional demand letters (1.3).	Del Castillo, Joshua	3.50	1,907.50	31,564.50	WO	HD	TR
05/30/24	9640941	Emails with counsel for Robinhood regarding account turnovers (0.3); prepare notes regarding same for discussion with Receiver's office and AM counsel (0.3); email to Receiver (0.1).	Del Castillo, Joshua	0.70	381.50	31,946.00	WO	HD	TR
05/31/24	9643192	Emails with Robinhood counsel and Receiver's office regarding turnovers (0.5); follow-up correspondence and discussions	Del Castillo, Joshua	1.00	545.00	32,491.00	WO	HD	TR

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered with AM counsel regarding other turnover efforts (0.5).	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/03/24	9646741	Correspondence with Robinhood counsel and Receiver's office regarding turnovers (0.6).	Del Castillo, Joshua	0.60	327.00	32,818.00	WO	HD	TR	_____
06/05/24	9649207	Follow-up on letter to insurers regarding turnover (0.3).	Del Castillo, Joshua	0.30	163.50	32,981.50	WO	HD	TR	_____
06/06/24	9650276	Emails with Receiver's office and Robinhood counsel regarding turnover demands and follow-ups to same (0.3); attention to issues regarding insurance policy turnover demands (0.4).	Del Castillo, Joshua	0.70	381.50	33,363.00	WO	HD	TR	_____
06/10/24	9654498	Emails with Receiver's office and third parties regarding pending turnover demands (0.5).	Del Castillo, Joshua	0.50	272.50	33,635.50	WO	HD	TR	_____
06/11/24	9656249	Attention to turnover issues and emails to Receiver's office regarding same (0.5); correspondence regarding Robinhood (0.2).	Del Castillo, Joshua	0.70	381.50	34,017.00	WO	HD	TR	_____
06/17/24	9663171	Confer with M. Pham and follow-up regarding insurance turnover inquiry (0.3).	Del Castillo, Joshua	0.30	163.50	34,180.50	WO	HD	TR	_____
06/18/24	9664496	Correspondence with Receiver's office regarding turnovers and prepare materials in connection with same (0.5); review correspondence from Robinhood regarding turnover accounting and transmit to Receiver (0.2).	Del Castillo, Joshua	0.70	381.50	34,562.00	WO	HD	TR	_____
06/19/24	9665797	Review and respond to correspondence from Receiver regarding turnover and	Del Castillo, Joshua	0.30	163.50	34,725.50	WO	HD	TR	_____

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Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		related accounting issues; review documents regarding same (0.3).								
06/21/24	9668176	Additional follow-up and attention to turnover issues (0.4); emails with Receiver's office and counsel regarding real properties turned over and awaiting disposition (0.3).	Del Castillo, Joshua	0.70	381.50	35,107.00	WO	HD	TR	_____
06/25/24	9673010	Emails with Receiver's office regarding pending and potential additional turnover demands (0.3); discuss prospectively required legal analysis in connection with same (0.2).	Del Castillo, Joshua	0.50	272.50	35,379.50	WO	HD	TR	_____
06/26/24	9673329	Review and respond to emails from Receiver's office regarding outstanding turnover issues (0.3); confer with M. Pham regarding same (0.2); review document productions and prepare legal analysis of turnover alternatives (1.0); prepare correspondence regarding same to Receiver's office (1.0).	Del Castillo, Joshua	2.50	1,362.50	36,742.00	WO	HD	TR	_____
06/27/24	9674523	Emails and follow-up regarding pending and outstanding turnover requests and related matters (0.7).	Del Castillo, Joshua	0.70	381.50	37,123.50	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.90	545.00	1,035.50
001842	Del Castillo, Joshua	65.40	545.00	35,643.00
002592	Robichaud, James	1.00	445.00	445.00
		68.30		\$37,123.50
Subtotal Fees				\$37,123.50

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Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
Discount				0.00
Total Fees				37,123.50
Total Disbursements				0.00

Attorney Billing Instructions

(<input type="checkbox"/>)	BILL ALL	(<input type="checkbox"/>)	Hold
(<input type="checkbox"/>)	BILL FEES ONLY	(<input type="checkbox"/>)	Write Off
(<input checked="" type="checkbox"/>)	BILL COST ONLY	(<input type="checkbox"/>)	<u>Transfer All</u>

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 08/01/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	7,303.00	7,303.00	0.00	53,721.00	53,721.00	0.00	245,713.50	245,713.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	4,868.39	4,823.07	45.32
Billed	0.00	0.00	0.00	9,136.50	9,136.50	0.00	195,710.57	195,710.57	0.00
Collected	0.00	0.00	0.00	9,136.50	9,136.50	0.00	195,710.57	195,710.57	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
 <i>WIP Balance</i>	 Total	 Fees	 Costs						
	45,511.00	45,511.00	0.00						
 <i>AR Balance Unalloc</i>	 0.00	 0.00	 0.00						
 <i>Payment</i>									
 <i>Client Trust Balance</i>	 0.00								

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC

08/12/24 10:52:20 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Geoff B. Winkler
American Fiduciary Services LLC
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

08/12/24 10:52:22 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua
 Matter #: 392775.00004
 Client Name: Winkler, Geoff - Receiver for J&J Consul
 Date of Last Billing: 06/01/24
 Matter Name: Investigation & Reporting
 Proforma Number: 1287426
 Client/Matter Joint Group # 392775.1
 Client Matter Number:

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	WO	HD	TR	
04/01/24	9604898	Follow-up regarding outstanding discovery and document turnover matters (0.5); emails with M. Pham and J. Robichaud regarding same (0.5); emails to Receiver's office (0.1).	Del Castillo, Joshua	1.10	599.50	599.50	WO	HD	TR			
04/02/24	9578602	Review and analyze correspondence with client's team regarding outstanding requests relating to document productions	Pham, Matt D.	0.60	267.00	866.50	WO	HD	TR			
04/03/24	9573781	Follow-up with M. Pham and J. Robichaud regarding outstanding discovery requests (0.3).	Del Castillo, Joshua	0.30	163.50	1,030.00	WO	HD	TR			
04/03/24	9573990	Prepare and revise subpoena and follow-up letter for Wells Fargo (1.5); finalize and transmit Credit Union 1 letter (.3).	Robichaud, James	1.80	801.00	1,831.00	WO	HD	TR			
04/03/24	9578617	Email correspondence with Jennifer Floyd and Grace Radke regarding Wells Fargo and Chase subpoenas (0.3); Update and revise subpoenas to Wells Fargo and JPMorgan Chase Bank (0.7)	Pham, Matt D.	1.00	445.00	2,276.00	WO	HD	TR			

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
							WO	HD	TR	
04/04/24	9574893	Draft new subpoena for Meadows Bank and correspond with G. Radke regarding same (.5); provide G. Radke with service details on prior subpoenas so she can provide such details to Meadows Bank (.2).	Robichaud, James	0.70	311.50	2,587.50	WO	HD	TR	
04/04/24	9574929	Review and respond to correspondence from Receiver's office regarding interim report (0.2); review materials in connection with excerpt for same (0.3).	Del Castillo, Joshua	0.50	272.50	2,860.00	WO	HD	TR	
04/04/24	9578082	Several emails and call with counsel related to discovery issues, follow-up.	Zaro, David	0.30	163.50	3,023.50	WO	HD	TR	
04/04/24	9578633	Draft and revise follow up letter to Wells Fargo (1.2); Update and revise subpoena and follow up letter to Wells Fargo (0.8); Email correspondence with Meadows Bank representative regarding subpoena (0.2); Email correspondence with client's team regarding Wells Fargo subpoena and follow-up letter (0.2); Cursory review of Citi's document production and email correspondence with client's team regarding same (0.2)	Pham, Matt D.	2.60	1,157.00	4,180.50	WO	HD	TR	
04/05/24	9578647	Review US Bank's response to follow-up letter for missing documents and email correspondence and phone call with Joel Hammerman regarding same (0.6); Email correspondence with Jennifer Floyd regarding US Bank's document production (0.2); Email correspondence with Josh del Castillo regarding US Bank's response to Receiver's proposed document production to SEC (0.2); Review correspondence from	Pham, Matt D.	1.80	801.00	4,981.50	WO	HD	TR	

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		client's team regarding outstanding requests for missing documents (0.8)								
04/06/24	9578128	Review and audit all outstanding discovery follow-up demands and correspondence and prepare inquiries for discussion with Receiver's office and M. Pham (3.5).	Del Castillo, Joshua	3.50	1,907.50	6,889.00	WO	HD	TR	_____
04/08/24	9578756	Review correspondence from U.S. Bank counsel and confer with AM counsel regarding subpoena from SEC (0.5); emails to Receiver and GT co-counsel (0.3).	Del Castillo, Joshua	0.80	436.00	7,325.00	WO	HD	TR	_____
04/10/24	9584786	Cursory review of document productions from Prudential and Chase and email correspondence with client's team regarding same (0.3); Cursory review of document production from Wells Fargo and email correspondence with Jen Floyd regarding same (0.2)	Pham, Matt D.	0.50	222.50	7,547.50	WO	HD	TR	_____
04/10/24	9602672	Review documents and prepare update to Receiver's office for Interim Report (0.6); follow-up regarding outstanding discovery matters (0.7); review correspondence from U.S. Bank counsel and confer regarding status of U.S. Bank inquiries (0.7).	Del Castillo, Joshua	2.00	1,090.00	8,637.50	WO	HD	TR	_____
04/11/24	9582040	Review correspondence from banks regarding pending productions and confer regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	8,910.00	WO	HD	TR	_____
04/11/24	9583162	Conferences with counsel concerning outstanding bank productions, enforcement strategy and follow-up on Receiver meeting.	Zaro, David	0.40	218.00	9,128.00	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	Circle	Action
							HD	TR	
04/11/24	9584792	Cursory review of document production from US Bank and email correspondence with client's team regarding same (0.2); Email correspondence with Jen Floyd regarding explanation of Wells Fargo subpoenas and follow-up letters and productions made in response thereto (1.1); Email correspondence with Wells Fargo's counsel regarding outstanding response to "withdrawal" transactions inquiry (0.1)	Pham, Matt D.	1.40	623.00	9,751.00	WO	HD	TR
04/12/24	9582977	Follow-up with Receiver's office and co-counsel regarding interim report and review notes regarding same (0.4); follow-up with M. Pham regarding Wells Fargo discovery issue (0.2).	Del Castillo, Joshua	0.60	327.00	10,078.00	WO	HD	TR
04/12/24	9584799	Review latest requests for missing documents from client's team (0.3); Begin making revisions and updates to Wells Fargo subpoena and follow-up letter (1.4)	Pham, Matt D.	1.70	756.50	10,834.50	WO	HD	TR
04/15/24	9586397	Emails with M. Pham regarding pending discovery and follow-up requests (0.2); attention to issues regarding same (0.3).	Del Castillo, Joshua	0.50	272.50	11,107.00	WO	HD	TR
04/15/24	9594266	Make revisions to follow-up letter to Wells Fargo for missing documents based on additional information from client's team	Pham, Matt D.	1.30	578.50	11,685.50	WO	HD	TR
04/16/24	9587808	Emails to Receiver's office regarding interim report and discovery issues (0.5); review notes regarding same (0.2); confer with M. Pham regarding same (0.2); review subpoenas (0.3).	Del Castillo, Joshua	1.20	654.00	12,339.50	WO	HD	TR

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
							WO	HD	TR	
04/16/24	9594271	Cursory review of document productions from Meadows Bank and Mountain America Credit Union and email correspondence with client's team regarding same (0.3); Update subpoena to Wells Fargo and follow-up letter to Wells Fargo based on additional information provided by client's team (1.0); Email correspondence with Grace Radke regarding American Express subpoenas previously served (0.3)	Pham, Matt D.	1.60	712.00	13,051.50	WO	HD	TR	
04/18/24	9594285	Email correspondence with Jennifer Floyd regarding request for transaction data relating to US Bank account 2073 (0.8); Prepare additional subpoenas to US Bank, US Bancorp, Wells Fargo, and Meadows Bank (2.2)	Pham, Matt D.	3.00	1,335.00	14,386.50	WO	HD	TR	
04/19/24	9594290	Email correspondence with Grace Radke regarding explanation of PayPal document production (0.4); Confer with Josh del Castillo regarding SEC's request for information relating to subpoenas (0.3); Begin compiling information sought by SEC relating to subpoenas and follow-up requests (1.1)	Pham, Matt D.	1.80	801.00	15,187.50	WO	HD	TR	
04/19/24	9602510	Correspondence with Receiver's office and M. Pham regarding discovery matters and SEC request for discovery summary (0.5); attention to issues regarding same (0.3); teleconference with M. Pham regarding same (0.3).	Del Castillo, Joshua	1.10	599.50	15,787.00	WO	HD	TR	
04/20/24	9594259	Review correspondence regarding discovery since inception of case and	Del Castillo, Joshua	2.60	1,417.00	17,204.00	WO	HD	TR	

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/22/24	9595374	prepare review recommendations for M. Pham and M. Kebbeh regarding discovery review and summary requested by SEC (2.6).	Del Castillo, Joshua	4.10	2,234.50	19,438.50	WO	HD	TR	_____
04/22/24	9602384	Emails and teleconferences with SEC, Receiver's office, and GT co-counsel regarding summary of discovery and declaration (1.3); confer with M. Pham, review materials, and prepare and revise language for declaration (1.5); attention to issues regarding exhibit to declaration and confer regarding same (0.5); review and prepare redlines to proposed declaration exhibit and transmit to GT co-counsel (0.8).	Pham, Matt D.	2.80	1,246.00	20,684.50	WO	HD	TR	_____
04/23/24	9602391	Email correspondence with U.S. Bank's counsel regarding additional subpoena and follow-up request (0.1); Email correspondence with Meadows Bank's counsel regarding additional subpoena (0.1); Phone call with Chase's representative regarding incorrect account number in subpoena and email correspondence with client's team regarding	Pham, Matt D.	2.30	1,023.50	21,708.00	WO	HD	TR	_____

08/12/24 10:52:22 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		same (0.1); Phone call with Joel Hammerman regarding additional subpoena and follow-up request (0.1); Continue preparing and revising additional subpoenas and follow-up letters to various financial institutions (1.9);								
04/23/24	9602514	Follow-up emails and discussions regarding discovery summary (0.7); confer with M. Pham regarding outstanding subpoenas (0.2); emails to M. Diaz regarding same (0.2).	Del Castillo, Joshua	1.10	599.50	22,307.50	WO	HD	TR	_____
04/24/24	9599229	Review several emails and confer with counsel related to pending subpoenas, bank follow-up and confer with counsel related to declaration and discovery chart.	Zaro, David	0.40	218.00	22,525.50	WO	HD	TR	_____
04/25/24	9599248	Conference with counsel related to the outstanding subpoenas to support accounting and the client agenda, memo and follow-up.	Zaro, David	0.30	163.50	22,689.00	WO	HD	TR	_____
04/26/24	9599100	Review and respond to correspondence from bank representatives regarding outstanding discovery follow-up (0.5); emails and voicemail to M. Pham regarding same (0.3).	Del Castillo, Joshua	0.80	436.00	23,125.00	WO	HD	TR	_____
04/26/24	9602430	Email correspondence with Grace Radke regarding information needed for bank subpoenas (0.1); Review emails from Grace Radke regarding additional subpoenas and begin preparing new set of subpoenas to banks (1.2)	Pham, Matt D.	1.30	578.50	23,703.50	WO	HD	TR	_____

08/12/24 10:52:22 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/29/24	9607996	Continue preparing additional subpoenas to financial institutions	Pham, Matt D.	1.60	712.00	24,415.50	WO	HD	TR	
04/30/24	9604377	Email follow-ups to AM counsel regarding pending and outstanding document demands (0.3); review notes from discussions regarding requests to Wells Fargo and US Bank (0.2); prepare update regarding same (0.3).	Del Castillo, Joshua	0.80	436.00	24,851.50	WO	HD	TR	
05/01/24	9608715	Emails with AM counsel and follow-up regarding outstanding discovery requests and attention to supplemental production issues (0.7); review final draft of interim report and emails to AM counsel regarding same (0.4).	Del Castillo, Joshua	1.10	599.50	25,451.00	WO	HD	TR	
05/02/24	9609441	Review correspondence from Credit Union 1 regarding subpoena to J. Judd, review prior correspondence and records, and confer with Receiver's office and GT co-counsel (0.6).	Del Castillo, Joshua	0.60	327.00	25,778.00	WO	HD	TR	
05/06/24	9613322	Follow-up emails to bank representatives regarding discovery matters (0.6); review notes regarding same (0.3); confer with AM counsel (0.6).	Del Castillo, Joshua	1.50	817.50	26,595.50	WO	HD	TR	
05/06/24	9619484	Confer with Josh del Castillo regarding Robinhood accounts (0.3); Continue preparing additional subpoenas to various financial institutions (0.4)	Pham, Matt D.	0.70	311.50	26,907.00	WO	HD	TR	
05/07/24	9619505	Prepare/update and finalize subpoenas to US Bank, US Bancorp, Wells Fargo, Meadows Bank, Frost Bank, Hawaiian	Pham, Matt D.	4.00	1,780.00	28,687.00	WO	HD	TR	

08/12/24 10:52:22 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Financial FCU, Metropolitan Commercial Bank, SchoolsFirst FCU, Sky FCU (3.4); Email correspondence with American Express regarding follow up on responses to subpoenas (0.2); review of Wells Fargo's latest document production and email correspondence with client's team regarding same (0.4)								
05/08/24	9615387	Prepare for and videoconference with GT attorney K. Ewing regarding forensic accounting and reporting issues (1.0); emails and teleconferences with M. Pham regarding outstanding subpoenas and discovery requests from Receiver (0.3); review correspondence from bank counsel regarding same (0.3); legal analysis of prospective privilege and privacy issue (1.8).	Del Castillo, Joshua	3.40	1,853.00	30,540.00	WO	HD	TR	_____
05/09/24	9616439	Review notes of discussion with K. Ewing, assemble materials, and analysis of issues regarding contemplated supplemental forensic accounting report (1.4).	Del Castillo, Joshua	1.40	763.00	31,303.00	WO	HD	TR	_____
05/09/24	9619543	Review of two document productions from Chase and email correspondence with client's team regarding same	Pham, Matt D.	0.60	267.00	31,570.00	WO	HD	TR	_____
05/10/24	9619568	Email correspondence with Jennifer Floyd and then with Wells Fargo's counsel regarding Wells Fargo's latest production	Pham, Matt D.	0.30	133.50	31,703.50	WO	HD	TR	_____
05/13/24	9620036	Review correspondence from Receiver's office and confer with M. Pham regarding Wells Fargo document productions and	Del Castillo, Joshua	1.00	545.00	32,248.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		related issues (1.0).						
05/13/24	9629076	Email correspondence with Madsen's counsel regarding subpoena to Meadows Bank	Pham, Matt D.	0.10	44.50	32,293.00	WO	HD
05/14/24	9621991	Review all Wells Fargo subpoenas and correspondence (1.2); confer with M. Pham regarding request from Receiver's office regarding Wells Fargo productions and respond to client inquiries regarding same (0.7); emails to special litigation counsel regarding discovery (0.5).	Del Castillo, Joshua	2.40	1,308.00	33,601.00	WO	HD
05/14/24	9629086	Phone call with John Giardino, counsel for Madsen, regarding Meadows Bank account (0.1); Email correspondence with John Giardino regarding request for documents (0.3); Email correspondence with SchoolsFirst FCU representative regarding subpoena (0.3)	Pham, Matt D.	0.70	311.50	33,912.50	WO	HD
05/15/24	9629105	Email correspondence with American Express representative regarding subpoena (0.1); Email correspondence with Grace Radke regarding outstanding subpoena issues (0.2)	Pham, Matt D.	0.30	133.50	34,046.00	WO	HD
05/16/24	9624270	Attend to issues regarding Wells Fargo production designations, review correspondence, and confer with M. Pham regarding same (1.1); legal analysis of issue presented in review of bank productions and follow-up emails to Receiver's office regarding same (1.1).	Del Castillo, Joshua	2.20	1,199.00	35,245.00	WO	HD

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
							WO	HD	TR	
05/17/24	9625770	Emails with bank and third party representatives regarding outstanding discovery matters (0.5); review correspondence regarding issues with prior productions and follow-up regarding same (0.6); prepare follow-up inquiries to Receiver's office (0.3).	Del Castillo, Joshua	1.40	763.00	36,008.00	WO	HD	TR	
05/20/24	9628807	Emails and confer with M. Pham regarding status of outstanding subpoena and related document recovery efforts (0.6); review correspondence to Receiver's office and third parties (0.2).	Del Castillo, Joshua	0.80	436.00	36,444.00	WO	HD	TR	
05/20/24	9632984	Review bank records provided by Madsen's counsel and email correspondence with Grace Radke regarding same (0.3); Email correspondence with Madsen's counsel regarding bank records (0.2); Additional email correspondence with Madsen's counsel regarding issues with bank records (0.4); Email correspondence with client's team regarding Wells Fargo and Meadows Bank production issues (0.2); Email correspondence with Wells Fargo's counsel regarding supplemental productions (0.1)	Pham, Matt D.	1.20	534.00	36,978.00	WO	HD	TR	
05/21/24	9630467	Review Wells objection to subpoena and confer regarding discovery issues and outstanding demands and productions (0.4).	Del Castillo, Joshua	0.40	218.00	37,196.00	WO	HD	TR	
05/21/24	9633004	Review and analyze Wells Fargo's objections to subpoena	Pham, Matt D.	0.20	89.00	37,285.00	WO	HD	TR	

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
							WO	HD	TR	
05/22/24	9631695	Emails and confer with M. Pham regarding Wells Fargo productions (0.5); prepare for and teleconference with D. Zaro regarding same (0.4).	Del Castillo, Joshua	0.90	490.50	37,775.50	WO	HD	TR	
05/22/24	9631974	Several conferences with counsel related to the subpoenas and W.F.B. responses and expediting the production (0.4). Call with counsel related to life insurance policies (0.2).	Zaro, David	0.60	327.00	38,102.50	WO	HD	TR	
05/22/24	9633006	Review latest productions from Wells Fargo and cross-reference with recent subpoenas and follow-up requests made to Wells Fargo (0.6); Email correspondence with Grace Radke regarding Nevada State Bank issue (0.2); Email correspondence with Jen Floyd regarding approach for Wells Fargo productions (0.1)	Pham, Matt D.	0.90	400.50	38,503.00	WO	HD	TR	
05/23/24	9632751	Confer with M. Pham regarding Wells Fargo production issues and attention to matters regarding same (0.7); prepare outline for discovery audit and assemble materials in connection with same (1.0); review correspondence from class counsel regarding discovery (0.2).	Del Castillo, Joshua	1.90	1,035.50	39,538.50	WO	HD	TR	
05/23/24	9633014	Cursory review of additional document productions from Chase and email correspondence with client regarding same (0.3); Confer with Josh del Castillo regarding Wells Fargo production issues (0.1)	Pham, Matt D.	0.40	178.00	39,716.50	WO	HD	TR	

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
							WO	HD	TR	
05/28/24	9636883	Confer with M. Pham regarding outstanding Wells Fargo discovery and results of discussions regarding production protocol (0.5); prepare updates regarding same (0.3).	Del Castillo, Joshua	0.80	436.00	40,152.50	WO	HD	TR	
05/28/24	9639656	Call with counsel concerning the subpoenas/WFB responses and strategy to expedite production.	Zaro, David	0.40	218.00	40,370.50	WO	HD	TR	
05/28/24	9640442	Email correspondence with American Express representative regarding document production (0.1); review of document productions from Bank of America, Hawaiian Financial FCU, Meadows Bank, and SchoolsFirst FCU and email correspondence with client regarding same (0.5); Phone call and email correspondence with Nevada State Bank/Zionscorporation's representative regarding scope of subpoena (0.1); Virtually meet with Wells Fargo's counsel regarding status of document productions (0.3)	Pham, Matt D.	1.00	445.00	40,815.50	WO	HD	TR	
05/29/24	9639307	Emails with M. Pham and M. Kebeh regarding subpoena preparation (0.3); confer with M. Pham regarding outstanding Wells Fargo productions (0.2).	Del Castillo, Joshua	0.50	272.50	41,088.00	WO	HD	TR	
05/29/24	9640449	Email correspondence with Grace Radke regarding new Charles Schwab subpoena	Pham, Matt D.	0.10	44.50	41,132.50	WO	HD	TR	
05/30/24	9640616	Emails and teleconference with M. Pham regarding Wells Fargo pending productions, subpoena responses, and agreement regarding future productions (0.4); analysis	Del Castillo, Joshua	0.80	436.00	41,568.50	WO	HD	TR	

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered of issues arising in connection with Battle Born prospective discovery (0.4).	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/30/24	9644238	Email correspondence with client's team regarding upcoming Wells Fargo productions	Pham, Matt D.	0.20	89.00	41,657.50	WO	HD	TR	
05/31/24	9640727	Attention to outstanding discovery regarding Wells Fargo productions and compose follow-up correspondence regarding same (1.1); prepare subpoenas (1.0).	Del Castillo, Joshua	2.10	1,144.50	42,802.00	WO	HD	TR	
05/31/24	9645801	Review of document productions from Frost Bank, American Express, One Nevada Credit Union and email correspondence with client's team regarding same	Pham, Matt D.	0.40	178.00	42,980.00	WO	HD	TR	
06/03/24	9646744	Finalize additional subpoenas (0.6); emails and confer with M. Pham regarding Wells Fargo issues (0.4).	Del Castillo, Joshua	1.00	545.00	43,525.00	WO	HD	TR	
06/04/24	9647751	Review notes from discussions with SEC, Receiver's office, and GT co-counsel regarding supplemental report regarding forensic accounting and related matters (0.5); prepare update and outline for associated discussion (0.6); emails with M. Pham regarding status of WF productions (0.2); attention to subpoena revisions and follow-up emails regarding subpoenas (0.8).	Del Castillo, Joshua	2.10	1,144.50	44,669.50	WO	HD	TR	
06/05/24	9649210	Follow-up on subpoenas to Mass Mutual, Wells Fargo and others (0.5); prepare inquiries regarding supplemental report (0.2); attention to inquiries regarding forensic accounting (0.3).	Del Castillo, Joshua	1.00	545.00	45,214.50	WO	HD	TR	

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/05/24	9653646	Cursory review of document production by Zions Bancorporation	Pham, Matt D.	0.20	89.00	45,303.50	WO	HD	TR	_____
06/06/24	9650782	Follow-up with M. Pham and internally regarding outstanding productions and status of demand letters and MM subpoena (0.5); emails with GT co-counsel and AM counsel regarding supplemental report regarding forensic accounting (0.4).	Del Castillo, Joshua	0.90	490.50	45,794.00	WO	HD	TR	_____
06/09/24	9655700	Prepare draft additional follow-up letters regarding pending discovery and turnover demands and correspondence regarding same (1.1).	Del Castillo, Joshua	1.10	599.50	46,393.50	WO	HD	TR	_____
06/10/24	9655694	Emails and confer with AM counsel regarding pending and outstanding discovery (0.5); review Receiver interim report and prepare inquiry regarding same (0.3); review emails from GT co-counsel and Receiver's office regarding supplemental report (0.4); review notes and documents regarding supplemental report (0.6); review and prepare recommended revisions to draft supplemental report (1.5); prepare notes for discussion with Receiver and co-counsel regarding same (1.0).	Del Castillo, Joshua	4.30	2,343.50	48,737.00	WO	HD	TR	_____
06/11/24	9656126	Teleconference with D. Zaro regarding draft forensic accounting report and prepare update and additional recommendations to Receiver and GT co-counsel (0.9); emails and confer with AM counsel regarding Wells Fargo and other outstanding discovery issues (0.4).	Del Castillo, Joshua	1.30	708.50	49,445.50	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/11/24	9663858	Evaluate the draft report and provide edits/comments to counsel as to accounting issues/reporting and followup. (0.8) Calls and followup emails with Receiver counsel as to accounting, outstanding subpoenas, and efforts to facilitate accounting. (0.6)	Zaro, David	1.40	763.00	50,208.50	WO	HD	TR	_____
06/12/24	9657194	Emails with M. Pham regarding discovery matters and review correspondence and notes regarding Wells Fargo productions (0.4).	Del Castillo, Joshua	0.40	218.00	50,426.50	WO	HD	TR	_____
06/13/24	9658951	Review correspondence from GT co-counsel regarding Judd subpoena (0.1); review notes and analysis of discernability of attorney payments / retainers (0.5); emails regarding subpoena follow-up (0.3).	Del Castillo, Joshua	0.90	490.50	50,917.00	WO	HD	TR	_____
06/13/24	9663740	Phone call with Bank of America regarding document productions	Pham, Matt D.	0.20	89.00	51,006.00	WO	HD	TR	_____
06/17/24	9662242	Review correspondence from U.S. Bank and confer with M. Pham regarding document production matters (0.5); follow-up regarding insurance demands and subpoenas (0.5).	Del Castillo, Joshua	1.00	545.00	51,551.00	WO	HD	TR	_____
06/18/24	9664511	Emails with Receiver's office regarding Prudential and Mass Mutual document/turnover demands and follow-up issues regarding same (0.4); confer with M. Pham regarding service analysis and other outstanding discovery issues (0.2).	Del Castillo, Joshua	0.60	327.00	51,878.00	WO	HD	TR	_____

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
							WO	HD	TR	
06/19/24	9666077	Follow-up emails to M. Pham regarding Mass Mutual and Wells Fargo subpoenas and review correspondence from Mass Mutual regarding same (0.5); review and respond to inquiry from special litigation counsel and confer with M. Pham regarding same (0.6); review Wells Fargo production history and correspondence from Wells counsel regarding same and prepare for teleconference with special litigation counsel (1.2).	Del Castillo, Joshua	2.30	1,253.50	53,131.50	WO	HD	TR	
06/19/24	9671108	Email correspondence with Josh del Castillo regarding update on Wells Fargo document productions	Pham, Matt D.	0.20	89.00	53,220.50	WO	HD	TR	
06/20/24	9666805	Review materials received from Prudential in response to discovery request/turnover inquiry and emails with Receiver's office and AM counsel regarding same (0.5); analysis of issues arising in connection with policy surrenders and associated values (0.7); teleconference with special litigation counsel regarding Wells Fargo litigation and related discovery dispute (0.5).	Del Castillo, Joshua	1.70	926.50	54,147.00	WO	HD	TR	
06/21/24	9671121	Review of latest productions from Wells Fargo, US Bank/US Bancorp Investments, and JPMorgan Chase and email correspondence with client's team regarding same	Pham, Matt D.	0.80	356.00	54,503.00	WO	HD	TR	
06/25/24	9680338	Prepare additional subpoenas to financial institutions and insurance companies	Pham, Matt D.	1.60	712.00	55,215.00	WO	HD	TR	

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Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
							WO	HD	TR	_____
06/26/24	9674519	Emails with Receiver's office and confer with M. Pham regarding additionally necessary subpoenas (0.3).	Del Castillo, Joshua	0.30	163.50	55,378.50	WO	HD	TR	_____
06/26/24	9680357	Email correspondence with client's team regarding update on subpoenas and productions (0.3); Confer with Josh del Castillo regarding life insurance policy obtained by Judd Family Foundation (0.2); Review US Bancorp Investments' document production for account statements for life insurance policy and email correspondence with Josh del Castillo regarding same (0.2)	Pham, Matt D.	0.70	311.50	55,690.00	WO	HD	TR	_____
06/27/24	9675619	Review notes and prepare inquiries to M. Pham regarding subpoenas (0.3).	Del Castillo, Joshua	0.30	163.50	55,853.50	WO	HD	TR	_____
06/28/24	9676477	Emails to M. Pham regarding subpoenas (0.2); review correspondence from Wells Fargo counsel regarding productions and discovery issues and follow-up regarding same (0.3).	Del Castillo, Joshua	0.50	272.50	56,126.00	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	3.80	545.00	2,071.00
001842	Del Castillo, Joshua	64.40	545.00	35,098.00
002510	Pham, Matt D.	40.10	445.00	17,844.50
002592	Robichaud, James	2.50	445.00	1,112.50
		110.80		\$56,126.00
Subtotal Fees				\$56,126.00
Discount				0.00
Total Fees				56,126.00
Total Disbursements				0.00

08/12/24 10:52:22 PROFORMA STATEMENT FOR MATTER 392775.00004 (Winkler, Geoff - Receiver for J&J Consul) (Investigation & Reporting)

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 08/01/24

	Fiscal YTD			Calendar YTD			LTD		
Worked	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Unbilled Adj	13,298.50	13,298.50	0.00	124,504.50	124,504.50	0.00	371,111.00	371,111.00	0.00
Billed	0.00	0.00	0.00	78.30	78.30	0.00	5,458.50	5,458.50	0.00
Collected	0.00	0.00	0.00	92,761.50	92,761.50	0.00	279,819.00	279,819.00	0.00
AR Write Off	0.00	0.00	0.00	92,761.50	92,761.50	0.00	279,819.00	279,819.00	0.00
	Total	Fees		Total	Fees		Total	Fees	
<i>WIP</i>	<i>85,833.50</i>	<i>85,833.50</i>		<i>0.00</i>					
<i>Balance</i>									
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>		<i>0.00</i>					
<i>Unalloc</i>									
<i>Payment</i>									
<i>Client Trust</i>									
<i>Balance</i>									

Billing AddressWinkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing
LLC; The Judd Irrevocable Trust; BJ Holdings LLC

Geoff B. Winkler

American Fiduciary Services LLC
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

08/12/24 10:52:24 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition &Transfer of Assets)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua
 Matter #: 392775.00006
 Client Name: Winkler, Geoff - Receiver for J&J Consul
 Date of Last Billing: 06/01/24
 Matter Name: Sale, Disposition &Transfer of Assets
 Proforma Number: 1287426
 Client/Matter Joint Group # 392775.1
 Client Matter Number:

Fees for Matter 392775.00006.(Sale, Disposition &Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	WO	HD	TR	
05/02/24	9609809	Review AM correspondence and notes regarding Flavocure asset, assignments, and anticipated sale (0.6); emails with D. Zaro and M. Pham and follow-up regarding same (0.4).	Del Castillo, Joshua	1.00	545.00	545.00	WO	HD	TR			
05/04/24	9611459	Review materials in connection with Receiver's pending turnover efforts and prepare follow-up inquiries regarding same (1.1).	Del Castillo, Joshua	1.10	599.50	1,144.50	WO	HD	TR			
05/21/24	9630284	Follow-up emails regarding Judd property and review correspondence from U.S. Bank regarding same (0.4); review title documents (0.2).	Del Castillo, Joshua	0.60	327.00	1,471.50	WO	HD	TR			
06/12/24	9657195	Review correspondence from U.S. Bank and Receiver's office regarding Judd California property (0.5); review file regarding same (0.3); emails to M. Pham regarding same (0.2).	Del Castillo, Joshua	1.00	545.00	2,016.50	WO	HD	TR			
06/17/24	9663656	Review file regarding recorded notices of pendency of receivership (0.5); review	Del Castillo, Joshua	1.30	708.50	2,725.00	WO	HD	TR			

08/12/24 10:52:24 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition &Transfer of Assets)

Fees for Matter 392775.00006.(Sale, Disposition &Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action	
06/20/24	9666994	emails from Receiver's office and U.S. Bank regarding Judd property (0.3); analysis of issues regarding California title and stipulated sale orders (0.5). Review notices of pendency of receivership and related documents and correspondence, and attention to issues regarding real properties turned over and available for sale (1.6); confer with M. Pham and Receiver's office regarding same (0.2); emails regarding Flavocure debentures and valuation issues (0.2).	Del Castillo, Joshua	2.00	1,090.00	3,815.00	WO HD TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	7.00	545.00	3,815.00
Subtotal Fees		7.00		\$3,815.00
Discount				\$3,815.00
Total Fees				0.00
Total Disbursements				3,815.00
				0.00

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() Transfer All

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 08/01/24

08/12/24 10:52:24 PROFORMA STATEMENT FOR MATTER 392775.00006 (Winkler, Geoff - Receiver for J&J Consul) (Sale, Disposition &Transfer of Assets)

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	4,409.00	4,409.00	0.00	157,112.50	157,112.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	782.30	780.80	1.50
Billed	0.00	0.00	0.00	1,902.00	1,902.00	0.00	152,516.70	152,516.70	0.00
Collected	0.00	0.00	0.00	1,902.00	1,902.00	0.00	152,516.70	152,516.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
 <i>WIP</i>	<i>Total</i> 3,815.00	<i>Fees</i> 3,815.00	<i>Costs</i> 0.00						
<i>Balance</i>									
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing
 LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

08/12/24 10:52:25 PROFORMA STATEMENT FOR MATTER 392775.00007 (Winkler, Geoff - Receiver for J&J Consul) (Pending Litigation)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua
 Matter #: 392775.00007
 Client Name: Winkler, Geoff - Receiver for J&J Consul
 Date of Last Billing: 06/01/24
 Matter Name: Pending Litigation
 Proforma Number: 1287426
 Client/Matter Joint Group # 392775.1
 Client Matter Number:

Fees for Matter 392775.00007.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
05/21/24	9630062	Review and respond to correspondence regarding class action issue and analysis of relation to principal receivership action (0.7).	Del Castillo, Joshua	0.70	381.50	381.50	WO HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	0.70	545.00	381.50
		0.70		\$381.50
Subtotal Fees				\$381.50
Discount				0.00
Total Fees				381.50
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() Transfer All

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

08/12/24 10:52:25 PROFORMA STATEMENT FOR MATTER 392775.00007 (Winkler, Geoff - Receiver for J&J Consul) (Pending Litigation)

Account Summary – As Of 08/01/24

	Fiscal YTD			Calendar YTD			LTD		
Worked	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Unbilled	0.00	0.00	0.00	381.50	381.50	0.00	27,023.00	27,023.00	0.00
Adj	0.00	0.00	0.00	0.00	0.00	0.00	623.00	623.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	26,018.50	26,018.50	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	26,018.50	26,018.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>Total</i>	<i>Fees</i>	<i>Costs</i>						
	<i>381.50</i>	<i>381.50</i>	<i>0.00</i>						
<i>Balance</i>									
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing

LLC; The Judd Irrevocable Trust; BJ Holdings LLC

Geoff B. Winkler

American Fiduciary Services LLC

715 NW Hoyt Street, Suite 4364

Portland, OR 97208

08/12/24 10:52:26 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua
 Matter #: 392775.00008
 Client Name: Winkler, Geoff - Receiver for J&J Consul
 Date of Last Billing: 06/30/23
 Proforma Number: 1287426
 Matter Name: Claims & Distribution
 Client/Matter Joint Group # 392775.1
 Client Matter Number:

Fees for Matter 392775.00008.(Claims & Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	WO	HD	TR	
06/07/24	9651897	Review voicemail from purported pre-receivership attorney representative and analysis of claim issue raised by same (1.0).	Del Castillo, Joshua	1.00	545.00	545.00						

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	1.00	545.00	545.00
		1.00		\$545.00
Subtotal Fees				\$545.00
Discount				0.00
Total Fees				545.00
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() Transfer All

Billing Instructions

expires 6/30/2024: Partners @ 545; Assoc @ 445; Paralegals @ 350

08/12/24 10:52:26 PROFORMA STATEMENT FOR MATTER 392775.00008 (Winkler, Geoff - Receiver for J&J Consul) (Claims & Distribution)

Account Summary – As Of 08/01/24

	Fiscal YTD			Calendar YTD			LTD		
Worked	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Unbilled	0.00	0.00	0.00	545.00	545.00	0.00	1,090.00	1,090.00	0.00
Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	545.00	545.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	545.00	545.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>Total</i>	<i>Fees</i>	<i>Costs</i>						
	545.00	545.00	0.00						
<i>Balance</i>									
<i>AR Balance</i>	0.00	0.00	0.00						
<i>Unalloc</i>	0.00								
<i>Payment</i>									
<i>Client Trust</i>	0.00								
<i>Balance</i>									

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing

LLC; The Judd Irrevocable Trust; BJ Holdings LLC

Geoff B. Winkler

American Fiduciary Services LLC

715 NW Hoyt Street, Suite 4364

Portland, OR 97208

EXHIBIT 2

EXHIBIT 2

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA RICKARD LAW
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669
 Federal I.D. # 27-4465751

Date 5/27/2024
 Invoice Number 7092-01_23
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 4/30/2024

Date	Employee	Description	Hours	Rate	Amount
4/1/2024	J Rickard	PROFESSIONAL FEES			
		Review minute order lifting stay in Wells Fargo action	0.2	375.00	75.00
4/2/2024	O Kelly	Review minute order lifting stay (0.1) (2:23-cv-00703)	0.1	145.00	14.50
4/15/2024	O Kelly	Review minute order re motion to take deposition of M Beasley (0.1)(2:22-cv-00612)	0.1	145.00	14.50
		Subtotal			104.00

Total Current Invoice \$104.00

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA RICKARD LAW
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669
 Federal I.D. # 27-4465751

Date 6/28/2024
 Invoice Number 7092-01_24
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 5/31/2024

Date	Employee	Description	Hours	Rate	Amount
5/13/2024	O Kelly	PROFESSIONAL FEES Review order granting motion to extend discovery deadlines, second request (2:22-cv-00612) (0.2)	0.2	145.00	29.00
		Subtotal			29.00

Total Current Invoice \$29.00

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA RICKARD LAW
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669
 Federal I.D. # 27-4465751

Date 7/20/2024
 Invoice Number 7092-01_25
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 6/30/2024

Date	Employee	Description	Hours	Rate	Amount
6/10/2024	O Kelly	PROFESSIONAL FEES Review e-mail from J del Castillo to chambers re Zoom link for hearing (2:22-cv-00612) (0.1)	0.1	145.00	14.50
6/12/2024	J Rickard	Prepare for and attend status check hearing	0.9	375.00	337.50
6/13/2024	O Kelly	Review minutes of proceedings from status conference on 6/12/24 (22-cv-00612) (0.1)	0.1	145.00	14.50
6/24/2024	O Kelly	Review order approving eighth quarterly status report (2:22-cv-00612) (0.1); file response to Wells Fargo Bank's motion for leave to take the deposition of M Beasley (2:23-cv-00703) (0.7)	0.8	145.00	116.00
6/24/2024	J Rickard	Review response to motion to depose Beasley in anticipation of filing	0.4	375.00	150.00
		Subtotal			632.50

Total Current Invoice \$632.50